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agency of the United States government that provided support to entrepreneurs and small businesses. The mission of the SBA was to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters.

2. As part of this effort, the SBA enabled and provided for loans through banks, credit unions, and other lenders. These loans had government backed guarantees.

The Paycheck Protection Program (PPP)

3. The Coronavirus Aid, Relief, and Economic Security Act, ("CARES" Act), was a federal law enacted in March 2020 and designed to provide emergency financial relief to the millions of Americans who were suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to small businesses payroll, mortgage interest, rent/lease and utilities, through a program referred to as the Paycheck Protection Program ("PPP"). In April 2020, Congress authorized up to \$310 billion in additional PPP funding.

4. The PPP allowed qualifying small businesses and other organizations to receive PPP loans. Businesses must use PPP loan proceeds for payroll costs, interest on mortgages, rent, and utilities. The PPP allowed the interest and principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on these expense items within a designated period of time and used a certain percentage of the PPP loan proceeds for payroll expenses.

5. The amount of PPP loan proceeds that a small business may have been entitled to receive was determined by the number of employees employed by the business and the business' average monthly payroll costs.

6. The PPP was overseen by the SBA, which had authority over all such loans. Individual PPP loans, however, were issued by private approved lenders (most commonly, banks and credit unions), who received and processed SBA Form 2483 (PPP loan application) and supporting documentation, and then made loans using the lenders' own funds.

7. To obtain a PPP loan, a qualifying business was required to submit a PPP loan application, which was signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the small business (through its authorized representative) was required to state, among other things, its: (a) average monthly payroll expenses; and (b) number of employees. These figures were used to calculate the amount of money the small business was eligible to receive under the PPP. In addition, businesses applying for a PPP loan were required to provide documentation showing their payroll expenses.

8. Small businesses and sole proprietorships applied for PPP relief through one of over 4,900 SBA designated lending institutions. To apply, applicants must complete and transmit to the lender a PPP loan application, which required the applicant to identify the entity's average monthly payroll, as calculated according to the

requirements of the CARES Act. The PPP loan application also required the applicant to certify that: “The Applicant was in operation on February 15, 2020 and had employees for whom it paid salaries and payroll taxes or paid independent contractors,” that “[c]urrent economic uncertainty makes the loan request necessary to support the ongoing operations of the Applicant” and that “[t]he funds would be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule.”

9. An applicant can submit a PPP loan application directly to an SBA approved lender such as a bank or to an SBA intermediary company that reviews the PPP loan application and then partners with a bank to fund the loan. The loan application is also transmitted to the SBA via an electronic platform known as ETRAN. Before submitting a PPP loan application through ETRAN, the lender or intermediary company must have collected the information and certifications set forth in the PPP loan application. Loans guaranteed under the PPP were 100% guaranteed by the SBA, and the full principal amount of the loans may qualify for loan forgiveness if the applicant certified that the funds were used as prescribed by the CARES Act.

10. The PPP loan application contained information as to the purpose of the loan, average monthly payroll, number of employees, and background of the business and its owner. Applicants were also required to make certain good faith certifications, including that economic uncertainty had necessitated their loan request for continued business operations, and that they intended to use loan proceeds only for the authorized purposes.

Social Media Platform

Artisha Gabriella Dimetrika Martin, aka Rikkita Jones, aka Gabby Martin, aka ArtyMar (Martin) utilized the social media platform Instragram to recruit applicants to submit fraudulent PPP loan applications. Instragram is a photo and video sharing social networking service owned and operated by American company Meta Platform, headquartered at 200 Jefferson Dr., Menlo Park, California.

Loan Application Intermediary

11. Bizz2Credit was a PPP loan application intermediary between the SBA and PPP loan applicants during the COVID-19 pandemic.

12. Blueacorn was a PPP loan application intermediary between the SBA and PPP loan applicants during the COVID-19 pandemic.

13. WOMPLY was a PPP loan application intermediary between the SBA and PPP loan applicants during the COVID-19 pandemic.

Financial Services Company

14. Itria Ventures LLC (Itria) was a financial services company doing business out of New York City, New York, that among other services assisted businesses in accessing SBA PPP loans.

15. Prestamos Community Development Financial Institution (Prestamos) was a financial services company headquartered in Phoenix, Arizona, that among other services assisted businesses in accessing SBA PPP loans.

16. Capital Plus, (Capital Plus) was a financial services company headquartered in Bedford, Texas, that among other services assisted in accessing SBA PPP loans.

17. The Enterprise Center Capital Corp. (Enterprise Capital) was a financial services company headquartered in Philadelphia, Pennsylvania, that among other services assisted in accessing SBA PPP loans.

18. Amur Equipment Finance, Inc. (Amur) was a financial services company headquartered in Grand Island, Nebraska, that among other services assisted in accessing SBA PPP loans.

19. Customers Bank was a financial services company headquartered in Malvern, Pennsylvania, that among other services assisted in accessing SBA PPP loans.

20. Benworth Capital Partners, LLC (Benworth) was a financial services company headquartered in Cora Gables, Florida, that among other services assisted in accessing SBA PPP loans.

21. Kabbage, Inc. (Kabbage) was a financial services company headquartered in Atlanta, Georgia, that among other services assisted in accessing SBA PPP loans.

Financial Institutions

22. Bank of America (BOA) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Charlotte, North Carolina.

23. Wells Fargo (WF) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in San Francisco, California.

24. Navy Federal Credit Union (NFCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Vienna, Virginia.

25. Smart Financial Credit Union (SFCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Houston, Texas.

26. Chime Financial, Inc. (CFI) was an American financial technology company that provides fee-free mobile banking services that are provided by The Bancorp Bank or Stride Bank, N.A. It was based in San Francisco, California.

27. Houston Texas Fire Fighters Federal Credit Union (HTFFFCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Houston, Texas.

28. Regions Bank (RB) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Birmingham, Alabama.

29. Capital One Bank (COB) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Denver, Colorado.

30. Essential Federal Credit Union (EFCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Baton Rouge, Louisiana.

31. Campus Federal Credit Union (CFCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Baton Rouge, Louisiana.

32. Pelican State Credit Union (PSCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Baton Rouge, Louisiana.

33. JP Morgan Chase Bank (JPMCB) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in New York City, New York.

34. Neighbors Federal Credit Union (Neighbors FCU) was a “financial institution,” as defined by 18 U.S.C. §§ 20 and 1956. It was based in Baton Ridge, Louisiana.

Digital Payment Network

35. ZELLE was a United States based digital payment network owned by Early Warning Services, LLC, a private financial services company owned by Bank of America, Truist, Capital One, JPMorgan Chase, PNC Bank, U.S. Bank, and Wells Fargo.

36. Cash App was a mobile payment service available in the United States and the United Kingdom that allows individuals to transfer money to one another using a mobile app.

37. Apple Pay was a mobile payment service by Apple Inc. that allows users to make payments in person, in iOS apps, and on the web.

38. PayPal was a United States multinational financial technology company operating an online payment system in the majority of countries that support online money transfers and serves as an electronic alternative to traditional paper methods such as checks and money orders.

39. Beginning in or about sometime in February 2021, the conspirators reached an agreement to fraudulently transmit fraudulent PPP loan applications. The conspirators filed PPP loan applications knowing that the information provided on the PPP loan applications regarding the financial records and the Profit or Loss from Business Schedule C for tax year 2019 (Schedule C) was fraudulent. The conspirators knew that the recruited applicants did not otherwise qualify for PPP funds as intended under the CARES Act.

COUNT ONE

Violation: 18 U.S.C. § 1349
(Conspiracy to Commit Wire
Fraud)

40. The General Allegations section (Paragraphs 1-39 herein) of this indictment is realleged and incorporated by reference as though fully set forth herein.

41. Beginning in or about a date unknown, but as early as January 2021, and continuing through in or about February 2022, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas, and elsewhere, the defendants, **Artisha Gabriella Dimetrika Martin**, aka Rikkita Jones, aka Gabby Martin, aka ArtyMar (Martin)(1), [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] along with others,

both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree to violate 18 U.S.C. § 1343, wire fraud, that is defendants knowingly devised a scheme to defraud by transmitting and causing to be transmitted fraudulent PPP loan applications which employed false material pretenses, false material representations and false material promises which defendants transmitted and caused to be

transmitted by way of wire communication in interstate commerce any writing, signs, signal, picture, or sound for the purposes of executing the scheme. The defendants acted with a specific intent to defraud the SBA and lending institutions to obtain money and property.

Overview of the Conspiracy

42. From in or about January 2021, and continuing through in or about February 2022, in the Eastern District of Texas and elsewhere, **Martin**, [REDACTED]

[REDACTED]
[REDACTED] entered into an agreement to commit wire fraud, that is, devised and intended to devise a scheme and artifice to defraud and to unlawfully obtain money and property by means of false and fraudulent material pretenses, false and fraudulent material representations, and false and fraudulent material promises, defendants knew the unlawful purpose of the agreement, and the defendants joined in the agreement with the intent to further the unlawful purpose of the agreement.

Role of the Conspirators

43. **Martin** executed a scheme to defraud the loan application intermediary, the SBA, and financial institutions that would finance an applicant's PPP loan. **Martin** utilized conspirators to recruit applicants that would submit fraudulent PPP loan applications to obtain PPP funds that the applicants would otherwise not qualify to receive. **Martin** would receive between \$2,000.00 and \$4,000.00 for each fraudulent PPP loan application that was approved. The recruiter or the applicant would pay **Martin**

between \$45.00 and \$80.00 to create either the fraudulent financial records or the fraudulent Schedule Cs or the applicant would pay **Martin** directly. **Martin** would in turn pay the fraudulent document creators between \$45.00 and \$80.00 to create fraudulent financial records. **Martin** was responsible for the submission of over 100 fraudulent loan applications and a loss of over \$2,400,000.00.

Fraudulent Document Creators

44. [REDACTED] generated fraudulent financial records and fraudulent Schedule C forms utilizing online programs that allowed them to generate fraudulent financial documents. [REDACTED] received between \$45.00 and \$80.00 for each fraudulent financial document created.

Recruiters

45. [REDACTED] recruited approximately twenty-four applicants and conspired to transmit twenty-five fraudulent PPP loan applications for approval. [REDACTED] provided **Martin** with the necessary personal identifying information of the applicant required to apply for the PPP loan application. [REDACTED] also provided **Martin** with the applicant's financial records so a fraudulent document creator could falsify the financial records to demonstrate that the applicant had business deposits that would qualify the applicant for a PPP loan. [REDACTED] either paid for **Martin's** fee on behalf of the applicant or [REDACTED] provided the applicant with **Martin's** Zelle, Cash App, Venmo, Apple Pay, and Pay Pal account for the applicant to pay **Martin** directly.

46. [REDACTED] recruited approximately three applicants and conspired to transmit four fraudulent PPP loan applications for approval. [REDACTED] provided **Martin**

with the necessary personal identifying information of the applicant required to apply for the PPP loan application. [REDACTED] also provided **Martin** with the applicant's financial records so a fraudulent document creator could falsify the bank records to demonstrate that the applicant had business deposits that would qualify the applicant for a PPP loan. [REDACTED] either paid for **Martin's** fee on behalf of the applicant or [REDACTED] provided the applicant with **Martin's** Zelle, Cash App, Venmo, Apple Pay, and Pay Pal account for the applicant to pay **Martin** directly.

47. [REDACTED] recruited approximately three applicants and conspired to transmit four fraudulent PPP loan applications for approval. [REDACTED] provided **Martin** with the necessary personal identifying information of the applicant required to apply for the PPP loan application. [REDACTED] also provided **Martin** with the applicant's financial records so a fraudulent document creator could falsify the bank records to demonstrate that the applicant had business deposits that would qualify the applicant for a PPP loan. [REDACTED] either paid for **Martin's** fee on behalf of the applicant or [REDACTED] provided the applicant with **Martin's** Zelle, Cash App, Venmo, Apple Pay, and Pay Pal account for the applicant to pay **Martin** directly.

48. [REDACTED] recruited approximately four applicants and conspired to transmit two fraudulent PPP loan applications for approval. [REDACTED] coordinated communication between the recruited applicants and **Martin**. [REDACTED] instructed the recruited applicants to forward personal identifying information to **Martin** to facilitate approval of their PPP loans.

49. [REDACTED] recruited two applicants and conspired to transmit two fraudulent PPP loan applications for approval. [REDACTED] coordinated communication between the recruited applicants and **Martin**.

50. [REDACTED] recruited approximately four applicants and conspired to transmit five fraudulent PPP loan applications for approval. [REDACTED] provided **Martin** with the necessary personal identifying information of the applicant required to apply for the PPP loan application. [REDACTED] also provided **Martin** with the applicant's financial records so a fraudulent document creator could falsify the financial records to demonstrate that the applicant had business deposits that would qualify the applicant for a PPP loan. [REDACTED] either paid for **Martin's** fee on behalf of the applicant or [REDACTED] provided the applicant with **Martin's** Zelle, Cash App, Venmo, Apple Pay, and Pay Pal account for the applicant to pay **Martin** directly.

51. [REDACTED] recruited one applicant and conspired to transmit four fraudulent PPP loan applications for approval. [REDACTED] provided **Martin** with the necessary personal identifying information of the applicant required to apply for the PPP loan application. [REDACTED] also provided **Martin** with the applicant's financial records so a fraudulent document creator could falsify the financial records to demonstrate that the applicant had business deposits that would qualify the applicant for a PPP loan. [REDACTED] either paid for **Martin's** fee on behalf of the applicant or [REDACTED] provided the applicant with **Martin's** Zelle, Cash App, Venmo, Apple Pay, and Pay Pal account for the applicant to pay **Martin** directly.

52. [REDACTED] recruited approximately three applicants and conspired to transmit three fraudulent PPP loan applications for approval. [REDACTED] provided **Martin** with the necessary personal identifying information of the applicant required to apply for the PPP loan application. [REDACTED] also provided **Martin** with the applicant's financial records so a fraudulent document creator could falsify the financial records to demonstrate that the applicant had business deposits that would qualify the applicant for a PPP loan. [REDACTED] either paid for **Martin's** fee on behalf of the applicant or [REDACTED] provided the applicant with **Martin's** Zelle, Cash App, Venmo, Apple Pay, and Pay Pal account for the applicant to pay **Martin** directly.

53. [REDACTED] recruited one applicant and conspired to transmit two fraudulent PPP loan applications for approval. [REDACTED] coordinated communication between the recruited applicants and **Martin**. [REDACTED] provided the recruited applicant details about **Martin's** role in obtaining approval of their PPP loan.

54. [REDACTED] recruited one applicant and conspired to transmit two fraudulent PPP loan applications for approval. [REDACTED] coordinated communication between the recruited applicant and **Martin**. [REDACTED] provided the recruited applicant details about **Martin's** role in obtaining approval of their PPP loan.

55. On the PPP loan applications, the conspirators misrepresented or caused to be misrepresented fraudulent material information such as the company name, IRS documents, business financial records, the true nature of their business, the number of employees, the date the business was established, and the amount of payroll. Based on these fraudulent material misrepresentations, the SBA and other financial institutions

approved and issued loans to the conspirators and applicants. Once in receipt of the fraudulently obtained funds, the conspirators and applicants did not use the money as intended by the CARES Act, such as to pay employee salaries, cover fixed debt, utility payments, or continue health care benefits for employees. Instead, the conspirators and applicants typically paid the leaders of the scheme a kickback, transferred money to their personal accounts, and spent the funds on various personal expenditures.

56. Members of the conspiracy collectively filed more than 100 fraudulent PPP loan applications. In total, members of the conspiracy collectively received more than \$2,400,000.00 in PPP funds that the conspirators and applicants would not otherwise qualify for pursuant to the requirements of the CARES Act.

Purpose of the Conspiracy

57. It was the general purpose of the conspiracy for the conspirators to unlawfully and unjustly enrich themselves by means of materially false and fraudulent material pretenses, representations, and promises, by among other things: (a) submitting and causing the submission of false and fraudulent PPP loan applications to obtain funds made available through the CARES Act to provide relief for the economic effects caused by the COVID-19 pandemic; (b) offering, paying, and receiving kickbacks in return for the submission of false and fraudulent PPP loan applications; and (c) diverting fraud proceeds for the personal use of the conspirators, the use and benefit of others, and to further the conspiracy.

Manner and Means of the Conspiracy

58. The manner and means by which the conspirators and applicants sought to accomplish the object and purpose of the conspiracy included, among others, the following:

59. **Martin** promoted the fraudulent PPP loan conspiracy utilizing Instagram account: “artymar__” and other social media outlets to recruit applicants to submit fraudulent PPP loan applications. Conspirators also recruited applicants by word of mouth and various other media outlets.

60. **Martin** informed the recruiter or applicant of the process on how to file a fraudulent PPP loan application and the cost to file by transmitting a text message, direct message, or other electronic message to the potential recruiter or applicant. The message normally entailed the following type of language:

“I charge 3k out of the 20k that will be deposited. The process is taking 3-5 days that’s including the day for the bank statement, if you have an EIN that was made before February 2020 we can use it if not your social is cool as well. Once payment has been made to me I will explain how to get your loan forgiven. Full name Ss DOB I’d / front to bank Voided check/ direct deposit form \$45 to make your bank statement.”

61. **Martin** utilized [REDACTED] to generate fraudulent financial records and Schedule Cs for a fraudulent PPP loan application.

62. The recruiters and applicants provided **Martin** with personal identifying information. **Martin** provided the personal identifying information to the fake document creator. This allowed the fake document creator to generate fraudulent bank records and

fraudulent Schedule Cs for tax year 2019. The fake document creators generated the fraudulent documents, that is, a fraudulent Schedule C for tax year 2019 and fraudulent bank records to show the applicant had a net profit that was impacted by COVID-19 which would qualify them for a PPP loan.

63. **Martin** transmitted a false and fraudulent PPP loan application, SBA Form 2483 – Borrower Application Form, for purposes of applying for a PPP loan.

64. The fraudulent PPP loan applications included multiple materially false and fraudulent pretenses, representations and promises, such as:

- a. The average monthly payroll and the number of employees;
- b. Listing that the purpose of the loan was to cover payroll costs;
- c. Listing the applicant as the owner of the business;
- d. Certifying that the funds will be used to retain workers and maintain payroll; and
- e. Certifying the truth of the statements in the loan application.

65. The conspirators and applicants alleged to have a business or sole proprietorship that was impacted by COVID-19 which would qualify them for PPP funds.

66. The conspirators had the funds from the fraudulent PPP loan transmitted into a financial institution that handled the applicant's financial interest in the fraudulent business.

67. The conspirators and applicants would pay a portion of the PPP funds to **Martin** as a kickback for her role in obtaining the PPP funds. The conspirators transmitted to **Martin's** bank account a kickback fee between \$2,000.00 to \$4,000.00

utilizing a digital payment network, a mobile payment service, and an online payment system such as Zelle, Cash App, Venmo, Apple Pay, and Pay Pal.

68. The conspirators and applicants submitted a PPP Loan Forgiveness Application Form 3508S to have the PPP loan forgiven. The loan forgiveness application form submitted certified that the applicant complied with all the PPP requirements regarding the use of the PPP funds to include:

- a. eligible uses of PPP loan proceeds;
- b. the amount of PPP loan proceeds that must be used for payroll cost;
- c. the calculation and documentation of the borrower's revenue reduction (if applicable); and
- d. the calculation of the borrower's requested loan forgiveness amount and that the information provided in the PPP loan application was true and correct in all material respects.

69. The conspirators and applicants transmitted wire transactions that affected interstate commerce by recruiting applicants using various social media outlets, and by requesting and receiving personal identifying information by text message, direct message, or email. The conspirators also affected interstate commerce by submitting PPP loan applications online through a portal set up by the SBA. The conspirators also affected interstate commerce by recruiting applicants that were located outside the State of Texas. The conspirators also affected interstate commerce by receiving compensation via a digital payment network, a mobile payment service, and an online payment system such as Zelle, Cash App, Venmo, Apple Pay, and Pay Pal.

Acts in Furtherance of the Conspiracy

70. In furtherance of the conspiracy and to achieve its object and purpose, **Martin** conspired with [REDACTED] [REDACTED] to submit and recruit applicants to submit fraudulent PPP loan applications that were committed in the Eastern District of Texas and elsewhere to include but not limited to the following:

Martin's First PPP loan application

71. On or about February 3, 2021, **Martin** transmitted \$45.00 to [REDACTED] Cash App. account "\$wideroff53." The subject line on this wire included the name **Martin's** nickname "gabby". This payment was the fee **Martin** paid [REDACTED] to develop the fraudulent documents for **Martin's** PPP loan application.

72. On or about February 11, 2021, **Martin** opened BOA account ##### 2795.

73. On or about February 17, 2021, **Martin** provided [REDACTED] with **Martin's** business name, ARTYMAR of Fashion, address, bank account, a monthly deposit amount, and deposit dates to facilitate [REDACTED] fabrication of fraudulent documents. [REDACTED] generated the fraudulent documents for **Martin** and delivered them to **Martin**.

74. On or about February 22, 2021, **Martin**, transmitted PPP loan application # 2049488506, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 2049488506 contained fraudulent bank

records and a fraudulent Schedule C. PPP loan application # 2049488506 caused Itria to transmit \$20,645.00 into **Martins'** BOA account number ##### 2795.

75. On or about July 8, 2022, **Martin** transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 2049488506. **Martin** certified that she complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

76. On or about July 13, 2021, **Martin's** PPP loan # 2049488506 was forgiven by the SBA.

MARTIN'S Second PPP loan application

77. On or about April 16, 2021, **Martin**, transmitted PPP loan application # 3294728809, second draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 3294728809 contained and referenced fraudulent bank records and a fraudulent Schedule C. PPP loan application # 3294728809 caused Itria to transmit \$20,645.00 into **Martin's** BOA account number ##### 2795.

MARTIN and [REDACTED] PPP loan application

78. On or about February 7, 2021, [REDACTED] provided his personal identifying information to **Martin** to begin the fraudulent PPP loan application for [REDACTED] [REDACTED] also paid [REDACTED] \$45.00 to fabricate fraudulent documents to submit with [REDACTED] PPP loan application.

79. On or about February 15, 2021, **Martin** and [REDACTED], transmitted PPP loan application # 8733678410, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 8733678410 referenced a

fictitious business: “Wiley Cutz”, located in Orange, Texas, (purportedly maintained by [REDACTED]), fraudulent bank records and a fraudulent Schedule C. PPP loan application # 8733678410 caused Itria to transmit \$20,833.33 into [REDACTED] COB account number ##### 2595.

80. On or about March 3, 2021, [REDACTED] compensated **Martin** \$2,000.00 for **Martin’s** role in filing the PPP loan application referenced in paragraph 79 above.

81. On or about June 28, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 8733678410 (“Wiley Cutz”). [REDACTED] certified he complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

82. On or about July 1, 2021, [REDACTED] PPP loan # 8733678410 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS’ PPP LOAN APPLICATIONS

Martin and [REDACTED] PPP loan applications

[REDACTED] First PPP loan application

83. On or about February 8, 2021, [REDACTED] provided her personally identifiable information to **Martin** to begin the fraudulent PPP loan application for [REDACTED]. [REDACTED] was paid \$45.00 to fabricate the fraudulent documents for [REDACTED] PPP loan application.

84. On or about February 15, 2021, **Martin** and [REDACTED] transmitted PPP loan application # 8728618409, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 8728618409 referenced a

fictitious business: “Chef T gayla” (purportedly maintained by [REDACTED]), fraudulent financial records and a fraudulent Schedule C. PPP loan application # 8728618409 caused Itria to transmit \$20,117.50 into [REDACTED] NFCU account number ##### 0856.

85. On or about July 19, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 8728618409 (“Chef T gayla”). [REDACTED] certified that she complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

86. On or about July 26, 2021, [REDACTED] PPP loan # 8728618409 was forgiven by the SBA.

[REDACTED] Second PPP loan application

87. On or about April 6, 2021, [REDACTED] transmitted \$65.00 to **Martin’s** Cash App. account \$4artymar. The subject line on this wire included “Gayla”. This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

88. On or about April 15, 2021, **Martin** and [REDACTED] transmitted PPP loan application, # 1625829001, second draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1625829001 referenced a fictitious business: “Chef T gayla” (purportedly maintained by [REDACTED]), fraudulent financial records and a fraudulent Schedule C. PPP loan application # 1625829001 caused Prestamos to transmit \$20,830.00 into [REDACTED] NFCU account number ##### 4202.

89. Between May 3, 2021, and May 5, 2021, [REDACTED] compensated **Martin**, via Zelle, \$3,000.00 for **Martin's** role in filing the PPP loan application referenced in paragraph 88.

90. On or about October 4, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1625829001 ("Chef T gayla"). [REDACTED] certified that [REDACTED] complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

91. On or about October 28, 2021, [REDACTED] PPP loan # 1625829001 was forgiven by the SBA.

Martin [REDACTED] PPP loan applications

[REDACTED] First PPP loan application

92. On or about February 17, 2021, [REDACTED] provided **Martin** with [REDACTED] personal identity information so **Martin** could process [REDACTED] fraudulent PPP loan application.

93. On or about February 27, 2021, **Martin**, [REDACTED], and [REDACTED] transmitted PPP loan application # 4555768509, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4555768509 contained a fictitious business: Reynolds Carpet Cleaning Service (purportedly maintained by [REDACTED]), fraudulent bank records and a fraudulent Schedule C. PPP loan application # 4555768509 caused Itria to transmit \$20,402.00 into [REDACTED] NFCU account number ##### 0856.

94. On or about March 11, 2021, [REDACTED] compensated **Martin** \$3,000.00 for **Martin's** role in filing [REDACTED] PPP loan application referenced in paragraph 93 above.

95. On or about July 20, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 4555768509 (Reynolds Carpet Cleaning Service). [REDACTED] certified that he complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

96. On or about July 23, 2021, [REDACTED] PPP loan # 4555768509 was forgiven by the SBA.

[REDACTED] Second PPP loan application

97. On or about April 6, 2021, [REDACTED] transmitted \$65.00 to **Martin's** Cash App. account \$4artymar. The subject line on this wire included "Jermaine". This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

98. On or about May 19, 2021, **Martin**, [REDACTED] and [REDACTED] transmitted PPP loan application, # 9647188904, second draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 9647188904 referenced a fictitious business: Reynolds Carpet Cleaning Service (purportedly maintained by [REDACTED], fraudulent financial records and a fraudulent Schedule C. PPP loan application # 9647188904 caused Enterprise Center to transmit \$20,833.00 into [REDACTED] NFCU account number ##### 4202.

99. On or about May 28, 2021, [REDACTED] compensated **Martin** \$3,000.00 for **Martin's** role in filing the PPP loan application referenced in paragraph 98.

100. On or about September 17, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 9647188904 (Reynolds Carpet Cleaning Service). [REDACTED] certified that he complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

101. On or about September 28, 2021, [REDACTED] PPP loan # 9647188904 was forgiven by the SBA.

Martin, [REDACTED], and Applicant E.D.W.'s PPP loan application

102. On or about March 31, 2021, **Martin, [REDACTED]** and Applicant E.D.W. transmitted PPP loan application # 5000918703, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 5000918703 referenced a fictitious business: "Motorcycle Mechanic", fraudulent financial records, and a fraudulent Schedule C. PPP loan application # 5000918703 caused Capital Plus to transmit \$20,832.00 into Applicant E.D.W.'s HTFFFCU account number ##### 4141.

103. On or about September 30, 2021, Applicant E.D.W. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 5000918703 ("Motorcycle Mechanic"). Applicant E.D.W. certified that Applicant E.D.W. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

104. On or about October 5, 2021, Applicant E.D.W.'s PPP loan # 5000918703 was forgiven by the SBA.

Martin, [REDACTED], and Applicant A.K.B.'s PPP loan application

105. On or about March 29, 2021, **Martin, [REDACTED]**, and Applicant A.K.B. transmitted PPP loan application # 3968948704, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 3968948704 caused Capital Plus to transmit \$20,832.00 into Applicant A.K.B.'s RB account number ##### 2639.

106. On or about October 3, 2021, Applicant A.K.B. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 3968948704. Applicant A.K.B. certified that Applicant A.K.B. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

107. On or about October 6, 2021, Applicant A.K.B.'S PPP loan # 3968948704 was forgiven by the SBA.

Martin, [REDACTED], and Applicant A.D.T.'s PPP loan application

108. On or about March 6, 2021, **Martin, [REDACTED]** and Applicant A.D.T. transmitted PPP loan application # 7060918508, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7060918508 caused Itria to transmit \$20,833.00 into Applicant A.D.T.'s BOA account number ##### 1391.

Martin, [REDACTED], and Applicant A.S.B.'s PPP loan application

109. On or about March 20, 2021, **Martin, [REDACTED]**, and Applicant A.S.B transmitted PPP loan application, # 1061448601, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application #

1061448601, caused Itria to transmit \$20,695.00 into Applicant A.S.B.'s COB account number ##### 3501.

110. On or about August 9, 2021, A.S.B. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1061448601. Applicant A.S.B. certified that Applicant A.S.B. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

111. On or about August 12, 2021, Applicant A.S.B.'s PPP loan # 1061448601 was forgiven by the SBA.

Martin, [REDACTED], and Applicant M.K.G.'s PPP loan application

112. On or about April 27, 2021, **Martin, [REDACTED]**, and Applicant M.K.G. transmitted PPP loan application #1415818908, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1415818908 caused Amur to transmit \$20,400.00 into Applicant M.K.G.'s COB account number ##### 5191.

113. On September 30, 2021, Applicant M.K.G. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1415818908. Applicant M.K.G. certified that Applicant M.K.G. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

114. On October 5, 2021, Applicant M.K.G.'s PPP loan # 1415818908 was forgiven by the SBA.

Martin, [REDACTED] and Applicant J.B.P.'s PPP loan application

115. On or about April 2, 2021, **Martin, [REDACTED]**, and Applicant J.B.P. transmitted PPP loan application # 6908648710, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 6908648710 caused Capital Plus to transmit \$20,832.00 into Applicant J.B.P.'s Neighbors FCU account number ##### 8233.

116. On or about May 5, 2021, Applicant J.B.P. compensated **Martin** \$3,000.00 for **Martin's** role in filing the application referenced in paragraph 115.

Martin, [REDACTED] and Applicant B.R.J.'s PPP loan application

117. On or about May 10, 2021, **Martin, [REDACTED]** and Applicant B.R.J. transmitted PPP loan application # 4161599009, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4161599009 caused Prestamos to transmit \$20,832.00 into Applicant B.R.J.'s BOA account number ##### 8492.

118. On or about December 1, 2021, Applicant B.R.J. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 4161599009. Applicant B.R.J. certified that Applicant B.R.J. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

119. On or about January 14, 2022, Applicant B.R.J.'s PPP loan # 4161599009 was forgiven by the SBA.

Martin, [REDACTED] and Applicant J.S.S.'s PPP loan application

120. On or about April 2, 2021, **Martin, [REDACTED]**, and Applicant J.S.S. transmitted PPP loan application # 7249298701, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7249298701 caused Capital Plus to transmit \$20,832.00 into Applicant J.S.S.'s COB account number ##### 3563.

121. On September 21, 2021, Applicant J.S.S. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 7249298701. Applicant J.S.S. certified that Applicant J.S.S. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

122. On September 28, 2021, J.S.S.'s PPP loan # 7249298701 was forgiven by the SBA.

Martin, [REDACTED], and Applicant N.J.W.'s PPP loan application

123. On or about May 25, 2021, **Martin, [REDACTED]**, and Applicant N.J.W. transmitted PPP loan application # 8503208904, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 8503208904 caused Amur to transmit \$20,833.00 into Applicant N.J.W.'s JPMCB account number ##### 9005.

124. On or about July 18, 2022, Applicant N.J.W. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 8503208904. Applicant N.J.W. certified that Applicant N.J.W. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

125. On or about July 25, 2022, Applicant N.J.W.'s PPP loan # 8503208904 was forgiven by the SBA.

Martin, [REDACTED], and Applicant R.S.S.'s PPP loan application

126. On or about April 22, 2021, **Martin, [REDACTED]**, and Applicant R.S.S. transmitted PPP loan application # 7107548807, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7107548807 caused Amur to transmit \$20,833.00 into Applicant R.S.S.'s RB account number ##### 1904.

Martin, [REDACTED] and Applicant A.A.'s PPP loan application

127. On or about April 15, 2021, **Martin, [REDACTED]**, and Applicant A.A. transmitted PPP loan application # 3223528803, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 3223528803 caused Amur to transmit \$20,832.00 into Applicant A.A.'s COB account number ##### 7819.

128. On or about October 12, 2021, Applicant A.A. transmitted and caused to be transmitted to PPP Loan Forgiveness Application Form 3058S for PPP loan # 3223528803. Applicant A.A. certified that Applicant A.A. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

129. On or about October 19, 2021, Applicant A.A.'s PPP loan # 3223528803 was forgiven by the SBA.

Martin, [REDACTED], and Applicant A.K.S.'s PPP loan application

130. On or about April 28, 2021, **Martin, [REDACTED]** and Applicant A.K.S. transmitted PPP loan application # 2859038905, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 2859038905 caused Amur to transmit \$20,833.00 into Applicant A.K.S.'s EFCU account number ##### 1595.

131. On or about November 20, 2021, Applicant A.K.S. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 2859038905. Applicant A.K.S. certified that Applicant A.K.S. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

132. On or about November 30, 2021, Applicant A.K.S.'s PPP loan # 2859038905 was forgiven by the SBA.

Martin, [REDACTED], and Applicant K.N.C.'s PPP loan application

133. On or about April 19, 2021, **Martin, [REDACTED]**, and Applicant K.N.C. transmitted PPP loan application # 5357178807, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 5357178807 caused Amur to transmit \$20,397.00 into Applicant K.N.C.'s CFCU account number ##### 0616.

134. On November 15, 2021, Applicant K.N.C. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 5357178807. Applicant K.N.C. certified that Applicant K.N.C. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

135. On or about July 27, 2022, Applicant K.N.C.'s PPP loan # 5357178807 was forgiven by the SBA.

Martin, [REDACTED], and Applicant K.B.R.'s PPP loan application

136. On or about May 8, 2021, **Martin, [REDACTED]**, and Applicant K.B.R. transmitted PPP loan application # 2563509008, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 2563509008 caused Prestamos to transmit \$20,832.00 into Applicant K.B.R.'s EFCU account number ##### 7494.

137. On or about September 30, 2021, Applicant K.B.R. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 2563509008. Applicant K.B.R. certified that Applicant K.B.R. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

138. On or about October 28, 2021, Applicant K.B.R.'s PPP loan # 2563509008 was forgiven by the SBA.

Martin, [REDACTED] and Applicant C.M.'s PPP loan application

139. On or about May 17, 2021, **Martin, [REDACTED]**, and Applicant C.M. transmitted PPP loan application # 4510879009, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4510879009 caused Prestamos to transmit \$ 20,832.00 into Applicant C.M.'s PSCU account number ##### 7693.

140. On August 23, 2022, Applicant C.M. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 4510879009. Applicant C.M. certified that

Applicant C.M. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

141. On August 29, 2022, Applicant C.M.'s PPP loan # 4510879009 was forgiven by the SBA.

Martin, [REDACTED], and Applicant L.S.R.'s PPP loan application

142. On or about April 22, 2021, **Martin, [REDACTED]**, and Applicant L.S.R. transmitted PPP loan application # 7143008806, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7143008806 caused Amur to transmit \$20,110.00 into Applicant L.S.R.'s PSCU account number ##### 6602.

143. On or about August 3, 2022, transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 7143008806. Applicant L.S.R. certified that Applicant L.S.R. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

144. On or about August 10, 2022, Applicant L.S.R.'s PPP loan # 7143008806 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin, [REDACTED], and Applicant M.R.'s PPP loan application

145. On or about May 3, 2021, **Martin, [REDACTED]**, and Applicant M.R. transmitted PPP loan application # 5646668906, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application #

5646668906 caused Amur to transmit \$20,833.00 into Applicant M.R.'s PSCU account number ##### 2326.

146. On or about November 29, 2021, Applicant M.R. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 5646668906. Applicant M.R. certified that Applicant M.R. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

147. On or about December 8, 2021, Applicant M.R.'s PPP loan # 5646668906 was forgiven by the SBA.

Martin, [REDACTED], and Applicant E.W.'s PPP loan application

148. On or about May 5, 2021, **Martin, [REDACTED]** and Applicant E.W. transmitted PPP loan application # 1903269000, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1903269000 caused Prestamos to transmit \$20,832.00 into Applicant E.W.'s EFCU account number ##### 1402.

149. On or about October 3, 2021, Applicant E.W. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1903269000. Applicant E.W. certified that Applicant E.W. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

150. On or about October 28, 2021, Applicant E.W.'s PPP loan # 1903269000 was forgiven by the SBA.

Martin, [REDACTED], and Applicant K.T.R.'s PPP loan application

151. On or about May 2, 2021, **Martin, [REDACTED]**, and Applicant K.T.R. transmitted PPP loan application # 1675059004, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1675059004 caused Prestamos to transmit \$20,832.00 into Applicant K.T.R.'s Neighbors FCU account number ##### 4952.

152. On or about October 19, 2021, Applicant K.T.R. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1675059004. Applicant K.T.R. certified that Applicant K.T.R. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

153. On or about October 28, 2021, Applicant K.T.R.'s PPP loan # 1675059004 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin, [REDACTED], and Applicant B.D.R.'s PPP loan application

154. On or about April 20, 2021, **Martin, [REDACTED]**, and Applicant B.D.R. transmitted PPP loan application # 1888198901, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1888198901 caused Prestamos to transmit \$20,832.00 into Applicant B.D.R.'s WF account number ##### 9773.

155. On or about December 1, 2021, Applicant B.D.R. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1888198901. Applicant B.D.R.

certified that Applicant B.D.R. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

156. On or about January 14, 2022, Applicant B.D.R.'s PPP loan # 1888198901 was forgiven by the SBA.

Martin, [REDACTED], and Applicant D.C.'s PPP loan application

157. On or about April 20, 2021, **Martin, [REDACTED]**, and Applicant D.C. transmitted PPP loan application # 4511768801, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4511768801 caused Customers Bank to transmit \$20,833.00 into Applicant D.C.'s checking account number ##### 8668.

Martin, [REDACTED], and Applicant M.M.'s PPP loan application

158. On or about April 26, 2021, **Martin, [REDACTED]**, and Applicant M.M. transmitted PPP loan application # 4368708910, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4368708910 caused Benworth to transmit \$20,833.00 into Applicant M.M.'s BOA account number ##### 7153.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin, [REDACTED], and Applicant A.B.'s PPP loan application

159. On or about May 18, 2021, **Martin, [REDACTED]** and Applicant A.B. transmitted PPP loan application # 7782269000, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7782269000

caused Prestamos to transmit \$20,832.00 into Applicant A.B.'s JPMCB account number ##### 9623.

Martin, [REDACTED], and Applicant D.H.'s PPP loan application

160. On or about April 27, 2021, **Martin, [REDACTED]**, and Applicant D.H. transmitted PPP loan application # 1052608904, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1052608904 caused Amur to transmit \$20,832.00 into Applicant D.H.'s COB account number ##### 2105.

161. On or about August 6, 2021, Applicant D.H. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1052608904. Applicant D.H. certified that Applicant D.H. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

162. On or about August 25, 2021, Applicant D.H.'s PPP loan # 1052608904 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin And [REDACTED] PPP Loan Application

163. On or about April 12, 2021, [REDACTED] transmitted \$80.00 to **Martin**. This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

164. On or about May 27, 2021, **Martin** and [REDACTED] transmitted PPP loan application # 7267989010, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7267989010 referenced a

fictitious business: “Jada Turner Wig Slay” (purportedly maintained by [REDACTED]), fraudulent financial records and a fraudulent Schedule C. PPP loan application # 7267989010 caused Enterprise Center to transmit \$20,832.00 into [REDACTED] COB account number ##### 1318.

165. On or about June 7, 2021, [REDACTED] compensated **Martin** \$3,500.00, for **Martin’s** role in filing the fraudulent application referenced in paragraph 164.

166. On or about February 22, 2023, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 7267989010. [REDACTED] certified that she complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

MARTIN, [REDACTED], AND APPLICANT J.T.’S PPP LOAN APPLICATION

167. On or about May 3, 2021, **Martin**, [REDACTED], and Applicant J.T. transmitted PPP loan application # 5957758906, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 5957758906 caused Amur to transmit \$20,833.00 into Applicant J.T.’s NFCU account number ##### 6267.

168. On or about November 30, 2021, Applicant J.T. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 5957758906 certified that Applicant J.T. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

169. On or about December 8, 2021, Applicant J.T.’s PPP loan # 5957758906 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin and [REDACTED] PPP loan application

170. On or about April 9, 2021, [REDACTED] provided **Martin** with [REDACTED] personal identity information so **Martin** could process [REDACTED] fraudulent PPP loan application.

171. On or about April 9, 2021, [REDACTED] transmitted \$65.00 to **Martin's** Cash App. account \$4artymar. This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

172. On or about April 19, 2021, **Martin** and [REDACTED] transmitted PPP loan application # 5643198803, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 5643198803 referenced a fictitious business: "Michelle Cummings Service" (purportedly maintained by [REDACTED]), fraudulent financial records, and a fraudulent Schedule C. PPP loan application # 5643198803 caused Amur to transmit \$20,833.00 into [REDACTED] PSCU account number ##### 5379.

173. On or about April 28, 2021, [REDACTED] compensated **Martin** \$3,000.00, for **Martin's** role in filing the PPP loan application referenced in paragraph 172.

174. On or about September 24, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 5643198803. [REDACTED] certified that [REDACTED] complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

175. On or about September 30, 2021, [REDACTED] PPP loan # 5643198803 was forgiven by the SBA.

Martin, [REDACTED], and Applicant M.C.'s PPP loan application

176. On or about May 24, 2021, **Martin, [REDACTED]**, and Applicant M.C. transmitted PPP loan application # 6771979001, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 6771979001 caused Enterprise Center to transmit \$20,833.00 into Applicant M.C. PSCU account number ##### 2800.

177. On or about September 27, 2021, Applicant M.C. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 1625829001. Applicant M.C. certified that Applicant M.C. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

178. On or about October 5, 2021, Applicant M.C.'s PPP loan # 6771979001 was forgiven by the SBA.

Martin, [REDACTED], and Applicant D.H.'s PPP loan application

179. On or about May 12, 2021, **Martin, [REDACTED]** and Applicant D.H. transmitted PPP loan application # 4612569000, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4612569000 caused Prestamos to transmit \$20,832.00 into Applicant D.H.'s EFCU account number ##### 6881.

180. On or about September 25, 2021, Applicant D.H. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 4612569000. Applicant D.H.

certified that Applicant D.H. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

181. On or about October 28, 2021, Applicant D.H.'s PPP loan # 4612569000 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin and [REDACTED] first PPP loan application

182. On or about February 9, 2021, [REDACTED] transmitted \$45.00 to **Martin's** Cash App account \$4artymar. This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

183. On or about February 9, 2021, **Martin** transmitted \$45.00 to [REDACTED] Cash App. account \$wideroff53. The subject line on this wire included "Texas Ayramis". This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

184. On or about February 15, 2021, **Martin** and [REDACTED] transmitted PPP loan application # 8427488403, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 8427488403 referenced a fictitious business: "Texas Carpet Cleaning" (purportedly maintained by [REDACTED]), fraudulent financial records and a fraudulent Schedule C. PPP loan application # 8427488403 caused Itria to transmit \$20,447.50 into [REDACTED] SFCU account number ##### 5450.

185. On or about April 5, 2021, through April 6, 2021, [REDACTED] compensated **Martin** \$2,000.00, for **Martin's** role in filing the fraudulent PPP loan application referenced in paragraph 184.

[REDACTED] second PPP loan application

186. On April 3, 2021, [REDACTED] transmitted \$130.00 to **Martin's** Cash App. account. This payment was the fee to develop fraudulent documents for [REDACTED] and Applicant B.B.'s PPP loan application.

187. On or about April 9, 2021, **Martin** and [REDACTED] transmitted PPP loan application, # 2098648807, second draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 2098648807 referenced a fictitious business: "Texas Carpet Cleaners" (purportedly maintained by [REDACTED]), fraudulent bank records and a fraudulent Schedule C. PPP loan application # 2098648807 caused Capital Plus to transmit \$20,832.00 into [REDACTED] RB account number ##### 3765.

188. On or about April 23, 2021, [REDACTED] compensated **Martin** \$3,000.00, for **Martin's** role in filing the fraudulent PPP loan application referenced in paragraph 187.

189. On July 5, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 2098648807 (Texas Carpet Cleaners). [REDACTED] certified he complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

190. On or about July 12, 2021, [REDACTED] PPP loan # 2098648807 was forgiven by the SBA.

Martin, [REDACTED] and Applicant B.B.'s PPP loan application

Applicant B.B.'s first PPP loan application

191. On or about February 22, 2021, **Martin, [REDACTED]**, and Applicant B.B. transmitted PPP loan application # 1763668504, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1763668504 caused Itria to transmit \$20,250.00 into Applicant B.B.'s BOA account number ##### 8944.

Applicant B.B.'s second PPP loan application

192. On or about April 14, 2021, **Martin, [REDACTED]**, and Applicant B.B. transmitted PPP loan application # 7641748808, second draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7641748808 caused Prestamos to transmit \$20,832.00 into Applicant B.B.'s BOA account number ##### 8944.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

MARTIN and [REDACTED] PPP loan application

193. On or about February 26, 2021, [REDACTED] transmitted \$46.00 to **Martin** for the development of fraudulent documents for a PPP loan application. [REDACTED] also provided **Martin** with her date of birth, social security number, her bank account information, and her address.

194. On or about February 27, 2021, **Martin** transmitted \$45.00 to [REDACTED] Cash App. account \$wideroff53. The subject line on this wire included "arlyssa". This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

195. On or about March 27, 2021, **Martin** and [REDACTED] transmitted PPP loan application, # 2241818705, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 2241818705 referenced a fictitious business: “McGees Travel Agent” (purportedly maintained by [REDACTED]), fraudulent financial records, and a fraudulent Schedule C. PPP loan application # 2241818705 caused Capital Plus to transmit \$20,832.00 into [REDACTED] PSCU account number ##### 561.

196. On or about September 14, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 2241818705 (“McGees Travel Agent”). [REDACTED] certified that she complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

197. On or about September 21, 2021, [REDACTED] PPP loan # 2241818705 was forgiven by the SBA.

MARTIN, [REDACTED], and Applicant A.R.’s PPP loan application

198. On or about March 6, 2021, **Martin**, [REDACTED] and Applicant A.R. transmitted PPP loan application # 7285708505, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 7285708505 caused Itria to transmit \$20,833.00 into Applicant A.R.’s PSCU account number ##### 5427.

MARTIN, [REDACTED], and Applicant S.K.’s PPP loan application

199. On or about April 18, 2021, **Martin**, [REDACTED] and Applicant S.K. transmitted PPP loan application #5399688805, first draw, to the SBA for approval

knowing information on the PPP loan application was false. PPP loan application # 5399688805 caused Amur to transmit \$20,832.00 into Applicant S.K.'s PSCU account number ##### 3561.

200. On or about September 14, 2021, Applicant S.K. transmitted and caused to be transmitted PPP Loan Forgiveness Application Form 3058S. Applicant S.K. certified that S.K. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

201. On or about September 24, 2021, Applicant S.K.'s PPP loan # 5399688805 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin and [REDACTED] PPP loan application

202. On or about April 12, 2021, [REDACTED] provided **Martin** her name, address, bank account information, a monthly deposit amount, and deposit dates to facilitate the production of a fraudulent financial statements.

203. On or about April 12, 2021, [REDACTED] transmitted \$80.00 to **Martin's** Cash App. account \$4artymar. The subject line read "For Shemeka". This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

204. On or about April 20, 2021, **Martin** and [REDACTED] transmitted PPP loan application, # 1106398909, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 1106398909 referenced a fictitious business: Hairstylist, fraudulent bank records and a fraudulent Schedule C. PPP

loan application # 1106398909 caused Prestamos to transmit \$20,832.00 into [REDACTED] BOA account number ##### 4957.

205. On or about May 11, 2021, [REDACTED] compensated **Martin** \$4,000.00 for **Martin's** role in filing the PPP loan application referenced in paragraph 204.

206. On or about September 21, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan #1106398909 ("Hairstylist"). [REDACTED] certified that she complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

207. On or about October 13, 2021, [REDACTED] PPP loan # 1106398909 was forgiven by the SBA.

Martin, [REDACTED], and Applicant T.T.'s PPP loan application

208. On or about May 10, 2021, **Martin**, [REDACTED] and Applicant T.T. transmitted PPP loan application, # 4126919003, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4126919003 referenced a fictitious business, fraudulent financial records, and a fraudulent Schedule C. PPP loan application # 4126919003 caused Prestamos to transmit \$ 20,832.00 into Applicant T.T.'s RB account number ##### 4453.

209. On or about February 26, 2022, Applicant T.T. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 4126919003. Applicant T.T. certified that Applicant T.T. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

210. On or about March 9, 2022, Applicant T.T.'s PPP loan # 4126919003 was forgiven by the SBA.

MARTIN, [REDACTED] AND APPLICANTS' PPP LOAN APPLICATIONS

Martin And [REDACTED] PPP Loan Application

211. On February 10, 2021, [REDACTED] provided **Martin** his name, physical address, and email address. [REDACTED] also provided **Martin** with a copy of his driver's license, bank account, a monthly deposit amount, and deposit dates to facilitate the production of a fraudulent financial statements. [REDACTED] transmitted \$45.00 to **Martin's** Cash App Account \$artishamartin95. This payment was the fee to develop fraudulent documents for [REDACTED] PPP loan application.

212. On or about February 15, 2021, **Martin** and [REDACTED] transmitted PPP loan application, # 8758608407, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 8758608407 referenced a fictitious business: "Martin's Landscaping" (purportedly maintained by [REDACTED]), fraudulent financial records, and a fraudulent Schedule C. PPP loan application # 8758608407 caused Itria to transmit \$20,387.50 into [REDACTED] COB account number ##### 5897.

213. Between March 11, 2021, and March 14, 2021, [REDACTED] compensated **Martin** \$3,000.00 for **Martin's** role in filing the PPP loan application referenced in paragraph 212.

Martin, [REDACTED] and Applicant A.D.'s PPP loan application

214. On or about February 27, 2021, **Martin, [REDACTED]** and Applicant A.D. transmitted PPP loan application # 4807428509, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 4807428509 referenced a fictitious business, fraudulent financial records, and a fraudulent Schedule C. PPP loan application # 4807428509 caused Itria to transmit \$20,677.00 into Applicant A.D.'s NFCU account number ##### 0662.

215. On or about July 27, 2021, Applicant A.D. transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 4807428509. Applicant certified that Applicant A.D. complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

216. On or about August 2, 2021, Applicant A.D.'s PPP loan # 4807428509 was forgiven by the SBA.

In violation of 18 U.S.C. § 1349.

Count Two

18 U.S.C. § 1343
(Wire Fraud)

217. The General Allegations section (Paragraphs 1-39 herein) of this indictment is realleged and incorporated by reference as though fully set forth herein.

Purpose of the Scheme and Artifice

218. From in or about January 2021, and continuing through in or about June 2021, in the Eastern District of Texas and elsewhere, **Artisha Gabrilla Dimetrika Martin**, aka Rikkita Jones, aka Gabby Martin, aka “Artymar” (1), [REDACTED]
[REDACTED]
[REDACTED] defendants, knowingly devised and intended to devise a scheme and artifice to unlawfully and unjustly enrich themselves by means of false and fraudulent pretenses, representations, and promises, by among other things: (a) submitting and causing the submission of a false and fraudulent PPP loan application to obtain funds made available through the CARES Act to provide relief for the economic effects caused by the COVID-19 pandemic; (b) offering, paying, and receiving kickbacks in return for the submission of a false and fraudulent PPP loan application; and (c) diverting fraud proceeds for the personal use of the defendants, and the use and benefit of others.

219. During the course of the scheme and artifice, **Martin**, [REDACTED] and [REDACTED] transmitted by means of wire communication in interstate and foreign commerce, writing, signs, signals, pictures, and sounds for the purpose of executing the scheme and

artifice to defraud and for obtaining money and property by means of false and fraudulent material pretenses, representations, and promises, and acted with specific intent to defraud.

Manner and Means of the Scheme and Artifice

220. It was part of the scheme and artifice that **Martin** promoted the fraudulent PPP loan scheme utilizing **Martin's** Instagram account: artymar__ and other social media outlets to recruit [REDACTED] to submit a fraudulent PPP loan application.

221. **Martin** informed [REDACTED] of the process to file a fraudulent PPP loan application and the cost to file by transmitting a text message, direct message, or other electronic message to [REDACTED]

222. [REDACTED] provided **Martin** with personal identifying information. **Martin** provided the personal identifying information to [REDACTED]. This allowed [REDACTED] to generate fraudulent financial records and a fraudulent Schedule C. [REDACTED] generated the fraudulent documents, that is, the fraudulent bank records and a fraudulent Schedule C to show that [REDACTED] had a net profit that was impacted by COVID-19 which would qualify him for a PPP loan.

223. **Martin** would transmit a false and fraudulent PPP loan application. [REDACTED] represented to have an operational business and that the operational business was impacted by COVID-19 which would qualify [REDACTED] for PPP loan funds as authorized by the CARES Act.

224. The fraudulent PPP loan application included multiple materially false and fraudulent pretenses, representations and promises, such as:

- a. The average monthly payroll and the number of employees;
- b. Listing that the purpose of the loan was to cover payroll costs;
- c. Listing the applicant as the owner of the business;
- d. Certifying that the funds will be used to retain workers and maintain payroll; and
- e. Certifying the truth of the statements in the loan application.

225. [REDACTED] had the funds from the PPP loan transmitted into a financial institution that handled [REDACTED] financial interest in the fictitious business.

226. [REDACTED] paid a portion of the PPP funds to **Martin** as a kickback for her role in obtaining the PPP funds. [REDACTED] transmitted to **Martin's** bank account a kickback fee of \$2,000.00 by utilizing a digital payment network.

227. [REDACTED], with Martin's assistance, submitted a PPP Loan Forgiveness Application Form 3508S to have the PPP loan forgiven. [REDACTED] certified that he complied with all the PPP requirements regarding the use of the PPP funds to include:

- a. eligible uses of PPP loan proceeds;
- b. the amount of PPP loan proceeds that must be used for payroll cost;
- c. the calculation and documentation of the borrower's revenue reduction (if applicable); and
- d. the calculation of the borrower's requested loan forgiveness amount and that the information provided in the PPP loan application is true and correct in all material respects.

228. **Martin** transmitted a wire that affected interstate commerce by sending wire transfers and by accessing and submitting the PPP loan application online through a portal set up by the SBA.

229. It was part of the scheme and artifice that **Martin** submitted a PPP loan application utilizing [REDACTED] personal identifying information to unlawfully obtain money from the CARES Act funds. [REDACTED] generated fraudulent bank records and a Schedule C to submit with the PPP loan application.

230. The fraudulent PPP loan application included multiple false and fraudulent material pretenses, representations and promises, such as:

- a. The average monthly payroll and the number of employees;
- b. Listing that the purpose of the loan was to cover payroll costs;
- c. Listing the applicant as the owner of the business;
- d. Certifying that the funds will be used to retain workers and maintain payroll; and
- e. Certifying the truth of the statements in the loan application.

Execution of the Scheme and Artifice

231. It was part of the scheme and artifice that defendants conducted the following acts to further the scheme and artifice in conducting the following wire transaction:

232. On or about February 15, 2021, **Martin**, [REDACTED] and [REDACTED], transmitted PPP loan application # 8733678410, first draw, to the SBA for approval knowing information on the PPP loan application was false. PPP loan application # 8733678410 referenced a fictitious business: “Wiley Cutz”, located in Orange, Texas, fraudulent financial records and a fraudulent Schedule C. PPP loan application #

8733678410 caused Itria to transmit \$20,833.33 into [REDACTED] COB account number ##### 2595.

233. On or about March 3, 2021, [REDACTED] compensated **Martin**, \$2,000.00 for **Martin's** role in filing the PPP loan application referenced in paragraph 232.

234. On or about June 28, 2021, [REDACTED] transmitted PPP Loan Forgiveness Application Form 3058S for PPP loan # 3294728809 ("Wiley Cutz"). [REDACTED] certified that he complied with the PPP rules and that the PPP loan application is true and correct in all material respects.

In violation of 18 U.S.C. § 1343.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

235. The allegations contained in Count One and Two are hereby realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeitures to the United States of America of certain property in which the defendants have an interest.

236. Upon conviction of any violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343, the defendants shall forfeit to the United States any property, real or personal, that constitutes or is derived from proceeds traceable to a violation of any offense constituting “specified unlawful activity,” or a conspiracy to commit such offense, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

237. The property that is subject to forfeiture includes, but is not limited to, the following:

- a. All funds subject to forfeiture in bank accounts receiving or transferring the fraudulently obtained proceeds; and
- b. A money judgment from:
 - i. **Artisha Martin** in the amount of \$2,420,274.30 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.
 - ii. [REDACTED] in the amount of \$296,843.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

iii. [REDACTED] in the amount of \$298,354.33 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

iv. [REDACTED] in the amount of \$20,833.33 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

v. [REDACTED] in the amount of \$392,940.70 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

vi. [REDACTED] in the amount of \$41,235.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

vii. [REDACTED] in the amount of \$62,497.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

viii. [REDACTED] in the amount of \$41,665.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

ix. [REDACTED] in the amount of \$41,664.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

x. [REDACTED] in the amount of \$41,665.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

xi. [REDACTED] in the amount of \$62,498.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

xii. [REDACTED] in the amount of \$82,361.50 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

xiii. [REDACTED] in the amount of \$64,275.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

xiv. [REDACTED] in the amount of \$41,664.00 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

xv. [REDACTED] in the amount of \$41,064.50 and all interest and proceeds traceable thereto, representing the proceeds of the offenses, for which the defendants are jointly and severally personally liable.

238. Pursuant to 21 U.S.C. § 853(p), as incorporated by reference by 18 U.S.C. § 982(b), if any of the forfeitable property, or any portion thereof, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of other property of the defendants up to the value of the above-described forfeitable properties, including, but not limited to, any identifiable property in the name of the defendants.

239. By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c).

240. All pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c), and the procedures set forth at 21 U.S.C. § 853, as made applicable through 18 U.S.C. § 982(b)(1).

A TRUE BILL

GRAND JURY FOREPERSON

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

REYNALDO P. MORIN
ASSISTANT UNITED STATES ATTORNEY

Date

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA

V.

**ARTISHA GABRIELLA DIMETRIKA
MARTIN** aka RIKKITA JONES, aka
GABBY MARTIN, aka ARTYMAR (1),

§

No. 1:24-CR-
JUDGE

NOTICE OF PENALTY

COUNTS 1-2

VIOLATION: 18 U.S.C. §§ 1349 and 1343
Conspiracy to Commit Wire Fraud and Wire Fraud

PENALTY: Imprisonment of not more than twenty (20) years; a fine not to exceed \$250,000, or twice the pecuniary gain to the defendant or loss to the victim; or both imprisonment and a fine; and a term of supervised release of not more than three (3) years. If the violation involves any benefit authorized in connection with a presidentially declared major disaster or emergency or affects a financial institution, the defendant may receive imprisonment of not more than thirty (30) years; a fine not to exceed \$1,000,000.00, or twice the pecuniary gain to the defendant or loss to the victim; or both imprisonment and a fine; and a term of supervised release of not more than five (5) years.

SPECIAL ASSESSMENT: \$100.00 each count.